

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

DOC # 94

UNITED STATES OF AMERICA,

v.

DOMINICK P. CAROLLO, STEVEN E.
GOLDBERG, and PETER S. GRIMM,

Defendants.

10-CR-0654 (HB)

**MOTION TO ADMIT JENNIFER L.
BEIDEL, ESQ. *PRO HAC VICE***

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Abigail Lauer, Esq., a member in good standing of the Bar of this Court, hereby move on behalf of David Eckhart and Investment Management Advisory Group, Inc. for an Order allowing the admission *pro hac vice* of:

Jennifer L. Beidel, Esq.
Saul Ewing LLP
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186
Phone: (215) 972-7850
Fax: (215) 972-1843
E-mail: jbeidel@saull.com

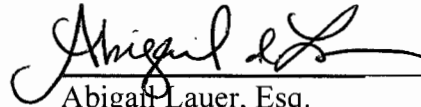
FILED
U.S. DISTRICT COURT
2011 DEC -2 PM 1:53
S.D. OF N.Y.

Jennifer L. Beidel, Esq. is a member of good standing of the Bar of the Commonwealth of Pennsylvania, the U.S. District Court for the Eastern District of Pennsylvania, the U.S. District Court for the Middle District of Pennsylvania, and the U.S. Court of Appeals for the Third Circuit. There are no pending disciplinary proceedings against Jennifer L. Beidel, Esq. in any State or Federal Court.

Dated: December 2, 2011

City, State: Newark, New Jersey

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Abigail Lauer', with a horizontal line drawn underneath it.

Abigail Lauer, Esq.

SDNY Bar: AL-8968

Saul Ewing LLP

One Riverfront Plaza, Suite 1520

Newark, New Jersey 07102

Phone: 973.286.6716

Fax: 973.286.6816

E-mail: alauer@saul.com

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

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v.

DOMINICK P. CAROLLO, STEVEN E.
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Defendants.

10-CR-0654 (HB)

**DECLARATION OF
ABIGAIL LAUER, ESQ.**

I, Abigail Lauer, Esq., hereby declare the following under penalty of perjury:

1. I am an Associate at the law firm of Saul Ewing LLP, counsel for movants David Eckhart and Investment Management Advisory Group, Inc. (collectively, "IMAGE") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of movant IMAGE's motion to admit Jennifer L. Beidel, Esq. as counsel *pro hac vice* to represent IMAGE in this matter.

2. I am a member in good standing of the Bar of the State of New York and have been since being admitted in 2007. I am also admitted to, and a member in good standing of, the Bar of the State of New Jersey, the United States District Court for the District of New Jersey, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, and the United States Court of Appeals for the Sixth Circuit.

3. Jennifer L. Beidel, Esq. is also an Associate at Saul Ewing LLP, in Philadelphia, Pennsylvania. I attach an Affirmation from Ms. Beidel in Support of the Notice of Motion to admit Counsel *Pro Hac Vice* as Exhibit 1.

4. I have found Ms. Beidel to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to move the admission of Jennifer L. Beidel, Esq., *pro hac vice*. I attach a Certificate of Good Standing from the Commonwealth of Pennsylvania as Exhibit 2, a Certificate of Good Standing from the U.S. District Court for the Eastern District of Pennsylvania as Exhibit 3, a Certificate of Good Standing from the U.S. District Court for the Middle District of Pennsylvania as Exhibit 4, and a Certificate of Good Standing from the U.S. Court of Appeals for the Third Circuit as Exhibit 5.

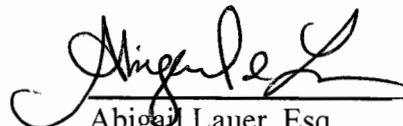
6. I respectfully submit a proposed order granting the admission of Jennifer L. Beidel, Esq., *pro hac vice*, which is attached hereto as Exhibit 6.

7. I declare the foregoing statements are true under penalty of perjury under the laws of the United States of America.

WHEREFORE it is respectfully requested that the motion to admit Jennifer L. Beidel, Esq. *pro hac vice*, to represent IMAGE in the above captioned matter be granted.

Dated: December 2, 2011

Respectfully Submitted,


Abigail Lauer, Esq.
SDNY Attorney I.D.: AL-8968

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**AFFIRMATION OF
JENNIFER L. BEIDEL, ESQ.**

JENNIFER L. BEIDEL ESQ. solemnly affirms and says:

1. I am an Associate at the law firm of Saul Ewing LLP. My Firm's principal address is Centre Square West, 1500 Market Street, 38th Floor, Philadelphia, Pennsylvania 19102. My business telephone is (215) 972-7850.
2. I received my law degree in 2006 from Penn State Dickinson School of Law in Carlisle, Pennsylvania.
3. I have been licensed to practice law in the Commonwealth of Pennsylvania since 2006. My Pennsylvania Attorney Registration No. is 204450. I have also been licensed to practice in the U.S. Court of Appeals for the Third Circuit since 2010, the U.S. District Court for the Eastern District of Pennsylvania since 2009, and the U.S. District Court Middle District of Pennsylvania since 2008.
4. I am, and always have been, a member in good standing of all Courts to which I have been admitted.
5. A recent Certificate of Good Standing from the Commonwealth of Pennsylvania is attached as Exhibit 2 to the Declaration of Abigail Lauer, Esq. as well as a recent Certificate of Good Standing from the U.S. District Court for the Eastern District of Pennsylvania attached as

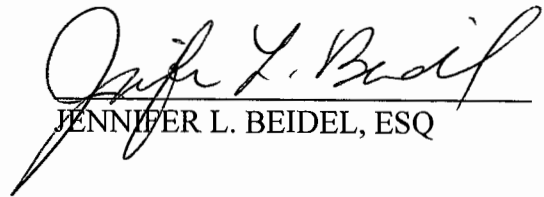
Exhibit 3, a recent Certificate of Good Standing from the U.S. District Court for the Middle District of Pennsylvania attached as Exhibit 4, and a recent Certificate of Good Standing from the U.S. Court of Appeals for the Third Circuit attached as Exhibit 5.

6. I have become familiar with the standards of professional conduct imposed upon members of the New York Bar and relevant statutes, rules and procedures, and I will abide by them.

7. Having spoken directly with my client on this matter, I represent to the Court that my client has full confidence in my legal abilities and wishes for me to participate as its counsel in this proceeding.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 22, 2011


JENNIFER L. BEIDEL, ESQ



Supreme Court of Pennsylvania

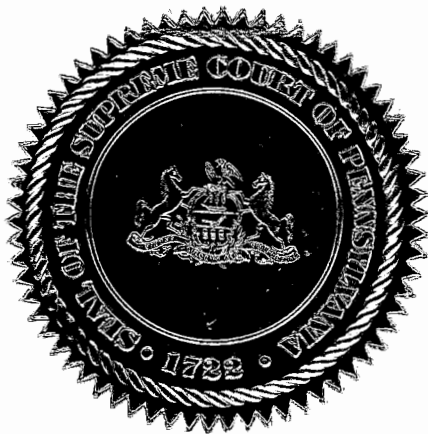
CERTIFICATE OF GOOD STANDING

Jennifer Lynn Beidel, Esq.

DATE OF ADMISSION

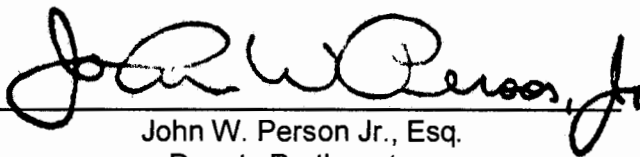
November 6, 2006

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: November 29, 2011


John W. Person Jr., Esq.
Deputy Prothonotary

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA }

I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That Jennifer L. Beidel , Bar # 204450 , was duly admitted to practice in said Court on February 18, 2009 , and is in good standing as a member of the bar of said Court.

DATED at Philadelphia, Pennsylvania

MICHAEL E. KUNZ

Clerk of Court

on November 29, 2011.

BY

Aida Ayala,

Deputy Clerk



CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

MIDDLE DISTRICT OF PENNSYLVANIA

I, Mary E. D'Andrea, Clerk of the United States District Court, Middle District of Pennsylvania, Do Hereby Certify That **Jennifer L. Beidel, Esquire**, was duly admitted to practice in said Court on August 22, 2008, and is in good standing as a member of the bar of said Court.

Dated at Scranton, Pennsylvania
on November 8, 2011.

MARY E. D'ANDREA, CLERK

By *Bereanne M. Lucchesi*
Deputy Clerk

**UNITED STATES COURT OF APPEALS FOR
THE THIRD CIRCUIT
CERTIFICATE OF GOOD STANDING**

I, MARCIA M. WALDRON, Clerk of the United States Court of Appeals for the Third Circuit, DO HEREBY CERTIFY THAT **Jennifer L. Beidel** was admitted to practice before this Court as an attorney and counselor on **April 28, 2010** he or she has never been suspended nor disbarred, and is presently a member of the bar of this Court in good standing.

I DO FURTHER CERTIFY that there are no grievances or complaints pending before the Disciplinary Committee of this Court against said attorney and counselor.

IN TESTIMONY WHEREOF, I have hereunto
subscribed my name and affixed the seal
of the said Court, at Philadelphia,
this 28th day of November, 2011.

MARCIA M. WALDRON, Clerk
United States Court of Appeals
For the Third Circuit

By: 

Patricia S. Dodszuweit
Chief Deputy

**UNITED STATES DISTRICT COURT FOR THE
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UNITED STATES OF AMERICA,

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Defendants.

10-CR-0654 (HB)

ORDER

Upon the motion of Saul Ewing LLP, attorneys for movants David Eckhart and Investment Management Advisory Group, Inc., and said sponsor's declaration in support:

IT IS HEREBY ORDERED that

Jennifer L. Beidel, Esq.
Saul Ewing LLP
Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186
Phone: (215) 972-7850
Fax: (215) 972-1843
E-mail: jbeidel@saul.com

is admitted to practice *pro hac vice* as counsel for movants David Eckhart and Investment Management Advisory Group, Inc. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: _____

City, State: New York, New York

Harold Baer, U.S.D.J.

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PROOF OF SERVICE

I, Abigail Lauer, Esq., hereby certify that on December 2, 2011, I caused the within Motion To Admit Jennifer L. Beidel, Esq. along with supporting documents to be served upon the following counsel of record via Federal Express:

Walter F. Timpone
Walter R. Krzastek, Jr.
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Morristown, NJ 07962
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John Sand Siffert
Lankler Siffert & Wohl LLP
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Attorneys for Defendant Steven E. Goldberg

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New York, NY 10278
Attorneys for United States


ABIGAIL LAUER